

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION**

CHELSEA C. HARDING,)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 1:22-cv-430
)	
KANAK EXPORTS INDIA, LLC/)	
KANAK NATURALS, LLC d/b/a)	
"KANAK")	
)	
Defendant.)	
)	

PETITION FOR REMOVAL

COMES NOW Defendant, Kanak Exports Indiana, LLC/Kanak Naturals, LLC d/b/a Kanak ("Kanak"), by counsel, pursuant to Title 28, United States Code, Section 1446, and respectfully petitions the Court as follows:

1. On November 17, 2022, an action was commenced against the Defendant, Kanak, in the Allen Superior Court of the State of Indiana, entitled *Chelsea C. Harding v. Kanak Exports Indian, LLC/Kanak Naturals, LLC d/b/a Kanak, Cause No: 02Do3-2211-CT-000590* by the filing of a Complaint with said Court. A copy of the Complaint, which was received by Kanak on or about November 21, 2022, and is attached hereto and incorporated herein as Exhibit "A".

2. The above-described action is a civil action of which this Court has original jurisdiction under the provisions of 42 U.S.C. Section 1981 and 29 U.S.C. Section 201, et seq. and is one which may be removed to this Court by Kanak.

3. Kanak has filed a Notice of Filing Petition for Removal contemporaneously herewith in the Allen County Superior Court.

WHEREFORE, Defendant, Kanak Exports Indiana, LLC/Kanak Naturals, LLC d/b/a Kanak, prays that the action above now pending against the Defendant in the Allen Superior Court be removed therefrom to this Court forthwith, and for all other just and proper relief in the premises.

BARRETT MCNAGNY LLP

Date: November 28, 2022

By: /s/Anthony M. Stites
Anthony M. Stites, #14078-71
Rachel K. Steinhofner, #29281-49
215 E. Berry Street
P. O. Box 2263
Fort Wayne, IN 46801
Phone: (260) 423-9551
Fax: (260) 423-8920
E-mail: ams@barrettllaw.com
rks@barrettllaw.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I have this 28th day of November 2022 electronically filed the foregoing with the Clerk of the Court using the CM/ECF which sent notification of such filing to the following:

Christopher C. Myers, #10043-02
Ilene M. Smith, #22818-02
MYERS SMITH WALLACE, LLP
809 South Calhoun Street, Ste. 400
Fort Wayne, IN 46802
cmyers@myers-law.com
ismith@myers-law.com

/s/ Anthony M. Stites
Anthony M. Stites